

REMARKS

The Office Action dated October 31, 2007 has been received and carefully noted. The above amendments to the 1, 7-8, 15, 18-20, 22-25 and 29-30, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-20, 22-25, and 27-34 are currently pending in the application, of which claims 1, 9, 18, 24, and 30 are independent claims. Claims 1, 7-8, 15, 18-20, 22-25 and 29-30 have been amended, and claims 31-34 have been newly added, to more particularly point out and distinctly claim the invention. No new matter has been added. Claims 1-20, 22-25, and 27-34 are respectfully submitted for reconsideration.

The Office Action rejected claims 7-8, 15 and 22 under 35 U.S.C. §112, second paragraph, for lacking antecedent basis with respect to "the messages." Applicants have made minor amendments to claims 7-8, 15 and 22 to correct those informalities. Withdrawal of the rejection is kindly requested.

Claims 1-20, 22-25 and 27-30 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,691,165 to Bruck et al. in view of U.S. Patent Application Publication No. 2002/0157018 of Syvanne. Applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-8 and 27 depend, is directed to a system that includes a network interface configured to communicate with nodes in a cluster. The system also includes a memory configured to store information relating to cluster management. The system further includes a configuration subsystem coupled to a remote

management broker, wherein the remote management broker is configured to distribute information between the nodes in the cluster. The system additionally includes a processor configured to access the cluster from a single-point. The processor is also configured to obtain information relating to at least two devices within the cluster. The processor is further configured to present the information to a user. The processor is additionally configured to determine network management operations to perform to the cluster. The processor is also configured to perform the determined network management operations. The processor is further configured to determine whether the network management operations on the cluster, including said at least two devices, were applied correctly, and when the network management operations were not applied correctly, roll back to a successful configuration.

Claim 9, upon which claims 10-17 and 28 depend, is directed to a method including accessing a cluster from a single-point. The method also includes obtaining attributes relating to at least two devices within the cluster. The method further includes receiving input from a user relating to the attributes. The method additionally includes determining network management operations to perform on the cluster based on the received input. The method also includes performing the determined network management operations on the cluster. The method further includes determining whether the network management operations on the cluster, including said at least two devices, were applied correctly, and when the network management operations were not applied correctly, rolling back to a successful configuration.

Claim 18, upon which claims 19-20, 22-23, and 29 depend, is directed to a computer program embodied on a computer readable medium, the computer program configured to control a processor to perform instructions for causing a computer to perform obtaining attributes relating to at least two devices within a cluster from a single-point. The instructions are also for causing a computer to perform receiving input relating to the attributes. The instructions are further for causing a computer to perform determining network management operations to perform on the cluster based on the received input. The instructions are additionally for causing a computer to perform distributing the network management operations to the devices within the cluster. The instructions are also for causing a computer to perform applying the network management operations. The instructions are further for causing a computer to perform determining whether the network management operations on the cluster, including said at least two devices, were applied correctly, and when the network management operations were not applied correctly, rolling back to a successful configuration.

Claim 24, upon which claim 25 depends, is directed to a cluster management apparatus including obtaining means for obtaining attributes relating to at least two devices within a cluster from a single-point. The apparatus also includes receiving means for receiving input relating to the attributes. The apparatus further includes determining means for determining network management operations to perform on the cluster based on the received input. The apparatus additionally includes distributing means for distributing the network management operations to the devices within the cluster. The

apparatus also includes applying means for applying the network management operations to the devices within the cluster. The apparatus further includes determining means for determining whether the network management operations on the cluster, including said at least two devices, were applied correctly, and when the network management operations on the cluster were not applied correctly, rolling back to a successful configuration.

Claims 30-31 are a means-plus-function and apparatus claim variations based on one or more of the above claims.

Applicants respectfully submit that the teachings of Bruck and Syvanne, individually or combined, fail to disclose or suggest all of the elements of any of the presently pending claims.

Bruck discloses a distributed server cluster for controlling network traffic. FIG. 2 of Bruck illustrates a server system 200 has front end servers 206, 208, 210 and 212 which communicate with a network, such as, the Internet. The system 200 also includes back end servers 220, 222, 224 and 226. The servers operate to forward network data, reassign network addresses, and share the load of network utilization etc. In particular, the front end servers provide a backup load balancing service to all servers on both the front and back end. New servers may be added and failed servers may be reassigned without interrupting the other servers.

The Office Action admitted certain deficiencies of Bruck with respect to the subject matter recited in the claims. Applicants agree that Bruck fails to disclose all of

the subject matter recited in the claims, however, Applicants disagree that Syvanne cures those admitted deficiencies of Bruck.

Syvanne discloses a method of managing a network device from a management system. FIG. 1 illustrates a managed device 11, and a management system 10 that operates by changing a configuration of the managed device 10. Paragraph [0012] of Syvanne discloses that subsequent to changing a configuration of the managed device 11, if a new connection between the management system 10 and the managed device 11 is not successfully made within a given time limit then the managed device 11 will automatically revert to a previous saved configuration.

The Office Action alleged that above-described subject matter (as described in paragraph [0012] of Syvanne) cures the deficiencies of Bruck with respect to the claims. Applicants disagree with the Office Action's alleged interpretation of Syvanne as applied to the claims of the present application. Applicants submit that Savanne does not teach or suggest managing nodes (more than one node) in a cluster and furthermore, does not teach or suggest,

“a processor configured to...obtain information relating to **at least two devices** within the cluster, present the information to a user, determine network management operations to perform to the cluster, perform the determined network management operations, and determine whether the network management operations on the cluster, including said at least two devices, were applied correctly, and when the network management operations were not applied correctly, roll back to a successful configuration”, as recited, in part, in claim 1, and similarly in claims 9, 18, 24 and 30-31. (Emphasis added)

Applicants have carefully reviewed the disclosure of Savanne, and cannot find any teaching or suggestion for managing a cluster of devices. Savanne is limited to the management and configuration of a single device. (Emphasis added) There is not cluster of nodes or network of devices that are managed by the management system of Savanne. Savanne discloses that the managed device is likely to be a firewall device. Managing network management operations in a cluster is beyond the scope of Savanne.

Therefore, the combination of Bruck and Savanne do not disclose or suggest “a processor configured to...obtain information relating to at least two devices within the cluster, present the information to a user, determine network management operations to perform to the cluster, perform the determined network management operations, and determine whether the network management operations on the cluster, including said at least two devices, were applied correctly, and when the network management operations were not applied correctly, roll back to a successful configuration”, as recited, in part, in claim 1, and similarly in claims 9, 18, 24 and 30-31. Accordingly, Applicants respectfully request that the rejection of independent claims 1, 9, 18, 24 and 30-31 be withdrawn. By virtue of dependency, claims 2-8, 10-17, 19-20, 22-23, 25, 27-29 and 32-34 should be allowed for at least their dependence upon claims 1, 9, 18, 24 and 30-31 and for the specific limitations recited therein.

For the reasons explained above, it is respectfully submitted that each of claims 1-20, 22-25, and 27-34 recite subject matter that is neither disclosed nor suggested in the

cited art. It is, therefore, respectfully requested that all of claims 1-20, 22-25, and 27-34 be allowed, and that this application be passed to issuance.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Additional Claim Fee Transmittal
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